

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION**

Google Inc., )  
                  )  
                  )  
                  )  
*Plaintiff,* )  
                  )  
                  )  
                  )  
                  )  
                  ) No. 3:14cv981 HTW-LRA  
                  )  
                  )  
Jim Hood, Attorney General of the State ) **ATTORNEY GENERAL JIM HOOD'S**  
of Mississippi, in his official capacity, ) **RESPONSE IN OPPOSITION TO**  
                  ) **PLAINTIFF GOOGLE INC.'S MOTION**  
                  ) **FOR A PROTECTIVE ORDER WITH**  
                  ) **RESPECT TO NOTICES OF RULE 30(b)(6)**  
                  ) **DEPOSITIONS OF GOOGLE INC.**  
*Defendant.* )  
                  )  
                  )  
                  ) ORAL ARGUMENT REQUESTED  
                  )

COMES NOW, Jim Hood, Attorney General of the State of Mississippi, in his official capacity (“Attorney General”), and files his Response in Opposition to Plaintiff Google Inc.’s Motion for a Protective Order with Respect to Notices of Rule 30(b)(6) Depositions of Google Inc.

Google, through its Motion for a Protective Order and its accompanying Memorandum, is seeking the Court’s protection from having to substantiate allegations in its Complaint. The Attorney General is not, as Google suggests, attempting to circumvent the Court’s previous rulings. Rather, as is proper in any litigation, the Attorney General is seeking to discover the factual basis of Google’s allegations.

The Attorney General requests that the Court deny Plaintiff’s Motion for a Protective Order for the reasons stated in the Attorney General’s accompanying Memorandum in

Opposition. In further support of his opposition, the Attorney General submits the Declaration of F. Jerome Tapley, with Exhibits (attached hereto).

THIS the 16<sup>th</sup> day of June, 2015.

Respectfully Submitted,

JIM HOOD, in his official capacity as Attorney General of the State of Mississippi

By: /s/ F. Jerome Tapley

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**CERTIFICATE OF SERVICE**

I, F. Jerome Tapley, one of the attorneys for Defendant Jim Hood, hereby certify that I have this date electronically filed the foregoing with the Clerk of the Court for the United States District Court for the Southern District of Mississippi through the Court's CM/ECF system. I further certify that all parties are represented by attorneys who are registered users of the CM/ECF system and that service will be accomplished through the CM/ECF system.

/s/ F. Jerome Tapley \_\_\_\_\_

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